

BEYS LISTON MOBARGHA & BERLAND LLP
Michael P. Beys

July 28, 2016

VIA ECF & FACSIMILE (212-805-4060)

The Honorable Ronald L. Ellis
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *United States v. Kaleil Isaza Tuzman*, No. S1 15 Cr. 536 (PGG)

Dear Judge Ellis:

We are co-counsel to defendant Kaleil Isaza Tuzman who was released on bail on July 18, 2016. We respectfully submit this letter to seek a one-week extension of the deadline by which to satisfy a condition of his bail, namely, for eight financially responsible persons ("FRP") to cosign his bond. The current deadline for them to sign is Friday, July 29, 2016, and we seek a one-week extension until Friday, August 5, 2016. Additionally, we respectfully seek a modification to the requirement of eight FRP's as cosigners, to seven FRP's plus one for moral suasion, namely, the defendant's sister, Naomi Tuzman-Eagan. The government consents to both of these requests.

By way of background, pursuant to the bail order signed by Magistrate Judge Frank Maas on July 15, 2016 (ECF 69), Mr. Isaza Tuzman was released on a five million dollar personal recognizance bond to be cosigned by eight FRP's. Of these, three had to cosign the bond prior to Mr. Isaza Tuzman's release, which occurred on July 18, 2016. The remaining cosigners must sign by Friday, July 29, 2016. Currently, five FRP's have been approved and have signed: (1) Edward Mullen, (2) Luis Orlando Isaza, (3) Intiya Isaza-Figueroa, (4) Milagro Isaza-Figueroa and (5) Thomas Stabb. Two additional cosigners, Marty Feinberg and William Schoettle, have been approved but have not yet signed. One cosigner, Naomi Tuzman-Eagan, has been approved for purposes of moral suasion but has not yet signed. Accordingly, we request a one-week extension of time to satisfy this bail condition.

Separately, we request that the Court accept one of the cosigners, Ms. Tuzman-Eagan, the defendant's sister, solely for purposes of moral suasion, not as an FRP. Accordingly, we request that the release order be modified to require only seven FRP's plus one for moral suasion, Ms. Tuzman-Eagan, instead of eight FRPs.

I have spoken with Assistant U.S. Attorney Andrea Griswold, and the government consents to both of these requests.

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We thank the Court in advance for its consideration.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Esq.
Counsel for Kaleil Isaza Tuzman

cc. Hon. Paul G. Gardephe, U.S.D.J. (via ECF)
All Counsel of Record (via ECF)